

FILED

DEC 04 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)	<u>SUPERSEDING</u>
)	<u>INDICTMENT</u>
Plaintiff,)	
)	
v.)	JUDGE JEFFREY J. HELMICK
)	
JEREMY DAVID ADAMS,)	CASE NO. <u>3:24CR14</u>
)	Title 18, United States Code,
Defendant.)	Sections 2251(a), 2252(a)(2)

COUNT 1

(Sexual Exploitation of a Minor (Production of Child Pornography), 18 U.S.C. § 2251(a))

The Grand Jury charges:

1. From on or about February 1, 2017 to on or about July 29, 2020, in the Northern District of Ohio, Western Division, and elsewhere, Defendant JEREMY DAVID ADAMS did employ, use, persuade, induce, or entice any minor, to wit: "K.A.," also known as "K.M.," who was under the age of 18 at the time, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or where such visual depiction has actually been transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, in violation of Title 18, United States Code, Section 2251(a).

COUNT 2

(Distribution of Child Pornography, 18 U.S.C. § 2252(a)(2))

The Grand Jury further charges:

2. From on or about May 4, 2017 to on or about May 7, 2017, in the Northern District of Ohio, Western Division, and elsewhere, Defendant JEREMY DAVID ADAMS did

ORIGINAL

knowingly receive and distribute any visual depiction using any means or facility of interstate commerce, the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

FORFEITURE SPECIFICATION

The Grand Jury further charges:

3. The allegations of Counts 1 and 2 are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a). As a result of the foregoing offenses, Defendant JEREMY DAVID ADAMS shall forfeit to the United States: (i) all property, real and personal, that was used - or was intended to be used - to commit or to promote the commission of the offenses charged in Counts 1 and 2; (ii) all property, real and personal, constituting or traceable to proceeds obtained from the offenses charged in Counts 1 and 2; and, (iii) all visual depictions described in 18 U.S.C. § 2252, and all books, magazines, periodicals, films, videotapes, and other matter which contain any such visual depictions, which were produced, transported, mailed, shipped or received in violation of 18 U.S.C. Chapter 110; including, but not limited to, the following:

- a) One Apple iPhone (FBI evidence item #21), seized from Defendant's residence;
- b) Western Digital external hard drive, serial # WYG1A29LVKHN, (FBI evidence item #17), seized from Defendant's residence;
- c) Alienware laptop, serial # JMFVCF2, (FBI evidence item #13), and its two (2) internal hard drives (an HGST 2.5 1 terabyte hard drive labeled Drive A, and a Samsung M2 hard drive, labeled Drive B), seized from Defendant's residence.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.